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APPELLANT'S AMENDED OPENING APPEAL BRIEF
TO FINAL OFFICE ACTION OF OCTOBER 30, 2006 AND
THIRD NOTICE OF NON-COMPLIANT BRIEF OF JAN. 28, 2008

15 To: Honorable Commissioner of Patents
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25 Pursuant to 37 C.F.R. §41.37, Appellant hereby submits an amended
opening appeal brief for application 10/017,469, filed December 14, 2001. A
Notice of Appeal was filed on March 30, 2007. A first Notification of Non-
Compliant Brief was mailed on November 1, 2007, a second on December 21,
30 2007 and a third on January 28, 2008. The appropriate forms accompany this
Brief for payment of any fees. Appellant appeals to the Board of Patent
Appeals and Interferences seeking review of the grounds of rejection in the
Final Office Action of October 30, 2006.

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1. Real Party in Interest

The real party in interest is Microsoft Corporation, the assignee of all right, title and interest in and to the subject invention.

5 2. Related Appeals and Interferences

Appellant is not aware of any other appeals, interferences, or judicial proceedings that will directly affect, be directly affected by, or otherwise have a bearing on the Board's decision to this pending appeal.

10 3. Status of Claims

Claims 1-44 are rejected. The rejections of Claims 1-44 are appealed.

The history of the claims is as follows:

- a. Claims 1-44 were originally filed.
- b. In an Office Action mailed February 11, 2005, all claims (1-44)
15 were rejected as being anticipated by Gudjonsson et al. (USPN 6,564,261)
under §102(e).
- c. An Examiner Interview was held on June 13, 2005.
- d. An Office Action Response was filed on June 13, 2005 where
Applicant amended claims 1, 8, 9, 24, 26, 37, 39 and 43.
- 20 e. An Interview Summary was mailed on July 7, 2005.

f. In a Final Office Action mailed August 26, 2005, all forty-four claims (1-44) were rejected as being anticipated by Gudjonsson et al. (USPN 6,564,261) under §102(e).

g. Appellant filed a Notice of Appeal and a Request for a Pre-Appeal
5 Brief Conference on November 28, 2005.

h. A Notice of Panel Decision from Pre-Appeal Brief Review was mailed on December 12, 2005. Per check boxes, without any specific written comment, this decision indicated that Appellant should proceed to Board of Patent Appeals and Interferences and that claims 1-44 are rejected.

10 i. Appellant filed an Opening Brief on February 28, 2006.

j. A Non-Final Office Action was mailed May 22, 2006, rejecting claims 1-4, 6, 11, 13-17, 19-24, 26-39 and 43 as being anticipated by Blakely et al. (USPN 5,604,490) under §102; claims 7-10, 40-42 and 44 as being unpatentable over Blakely et al. in view of White (USPN 6,826,692) under §103;
15 and claims 5, 12, 18 and 25 as being unpatentable over Blakely et al. in view of Gudjonsson et al. (USPN 6,564,261) under §103.

k. An Office Action Response was filed on August 22, 2006 where Applicant amended claims 1, 11, 13, 24, 26, 37, 39, 41 and 43.

l. A Final Office Action was mailed on October 30, 2006, rejecting
20 claims 1-4, 6, 11, 13-17, 19-24, 26-39 and 43 as being unpatentable over Blakely et al. (USPN 5,604,490) in view of Smith et al. (USPN 6,578,078) under §103; claims 7-10, 40-42 and 44 as being unpatentable over Blakely et al. and

Smith et al. in view of White (USPN 6,826,692) under §103; and claims 5, 12, 18 and 25 as being unpatentable over Blakely et al. and Smith et al. in view of Gudjonsson et al. (USPN 6,564,261) under §103.

m. A Notice of Appeal was filed on March 30, 2007.

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4. Status of Amendments

Applicant believes that all amendments have been entered. In particular, Applicant believes that the amendments submitted in the Office Action Response filed on August 22, 2006 have been entered for claims 1, 11, 13, 24, 26, 37, 39, 41 and 43.

10

5. Summary of Claimed Subject Matter

As set forth in Appellant's Response to the First Office Action:

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The instant application pertains to heterogeneous networks. A particular example considers a scenario where a user may have more than one user name in such heterogeneous networks. For example, a user may have a user name for a network that relies on a WINDOWS® OS and a different user name for a network that relies on a UNIX OS. Table 1 at page 20 of the instant application gives two examples: a user with a user name JohnDoe for a WINDOWS® OS network and a user name Johnd for a UNIX OS network and a user with a user name Maryjane for a WINDOWS® OS network and Maryj for a UNIX OS network. This is just one issue that may arise in a heterogeneous network.

25

Response of 6/13/05 at pages 12 and 13.

Independent claims 1, 11, 13, 24, 26, 37, 39, 41 and 43 are directed to subject matter where a user may have more than one user name in such heterogeneous networks. Claims that depend on claim 1 further recite "wherein

the mappings includes using a map on a mapping server” (claim 8); “wherein the mappings includes using remote procedure calls” (claim 9); and “wherein the remote procedure calls comprise at least one remote procedure call selected from the group consisting of getting credentials, authenticating using
5 credentials, checking map status, and dumping maps remote procedure calls” (claim 10). Claims that depend on independent claim 13 (claims 21, 22 and 23) recite similar subject matter. Claims that depend on independent claim 26 (claims 34, 35 and 36) recite similar subject matter.

Independent claim 39 recites, in part, “mapping the user name
10 associated with the user in the second network to a user identification number associated with the user in the second network, wherein the mapping includes using a map on a mapping server and the mapping server maintains a default map, a simple map and/or explicit maps that provide override”. Claim 40, which depends on claim 39, recites “wherein the mapping server further comprises
15 algorithms for unmapping users, mapping multiple users and/or group mapping”. Claims 40 and 42 recite similar mapping subject matter together with authenticating a user. Claims 43 and 44 are also directed to mapping.

Independent claims 11, 24 and 37 are computer-readable medium (CRM) claims that recite subject matter of independent claims 1, 13 and 26,
20 respectively. Thus, claims 1 and 11 belong to the same group, claims 13 and 24 belong to the same group and claims 26 and 37 belong to the same group.

In a First Notification of Non-Compliant Appeal Brief mailed November 1, 2007, Appellant was notified that “the brief does not contain a concise explanation of the subject matter of each of the independent claims” In an effort to reply with this notice, Appellant inserted below a portion of the brief as
5 filed originally under the heading “Rejection of Independent Claims”. Appellant also inserted additional information that refers to the specification and/or the drawings.

In a Second Notification of Non-Compliant Appeal Brief mailed December 21, 2007, it was not noted of a deficiency per item 4 of the form
10 PTOL-462). However, in a Third Notification of Non-Compliant Appeal Brief, item 4 was checked along with a statement indicating that “the brief does not contain a concise explanation of the subject matter of each of the independent claims”

Applicant again attempts to satisfy the Office’s request, which was
15 apparently overlooked as not being satisfied in the Second Notification of Non-Compliant Appeal Brief mailed December 21, 2007.

Applicant tried to use acronyms to facilitate explanation of the claims in Groups 1-6, for examples, as stated previously: In the listing of Groups 1-6, below, the term “heterogeneous network” is abbreviated as “HN”, the term “user
20 name” is abbreviated “UN”, the term “authenticated user” is abbreviated “AU” and the term “user identification number” is abbreviated “UIN”. The

independent claims are summarized as follows where a group includes

associated dependent claims:

Applicant now amends the concise explanation by presenting both the
acronyms and expanded definitions:

5

Claims 1 and 11 (Group 1)

Concisely stated, independent claims 1 and 11 recite mapping of a user
name (UN) for a user in a first network to a user name for the user in a second
network (UN') and mapping the user name in the second network to a user
10 identification number (UIN). As the first network and the second network differ,
the mapping occurs in a heterogeneous network (HN).

As stated in the last two versions of the Opening Appeal Brief: "Mapping
UN-UN'-UIN in a HN" - see Fig. 3 where one box lists "Windows Users" and
another box lists "Unix Users" and "UID" (e.g., a "user identification number"),
15 please note that "Window" refers to a network with a particular operating system
and "Unix" refers to a network with a different operating system, hence, this is a
"heterogeneous network".

Claims 13 and 24 (Group 2)

20 **Concisely stated**, independent claims 13 and 24 recite mapping of an
authenticated user (AU) to a user identification number (UIN) in a
heterogeneous network (HN).

As stated in the last two versions of the Opening Appeal Brief: “Mapping AU-UIN in a HN” – see page 3, lines 4-14 for “authenticated user”, page 14, lines 19-25 (“In such a network, each computer authenticates the user and once
5 the user is authenticated, the user’s SID indicates that user’s degree of access to network resources.”) and page 17, lines 14-21 (“Accordingly, an exemplary user information service including transparent access requires users to authenticate themselves only once (e.g., a single logon) for local and/or remote resource access. For example, such a feature allows WINDOWS® OS users
10 access to UNIX® OS network file system resources with a single sign on (logon). Users on a heterogeneous network using an exemplary user information service including this feature do not have to remember two sets of user names and passwords, or sign on separately to the two (or more) operating systems.”);

15

Claims 26 and 37 (Group 3)

Concisely stated, independent claims 26 and 37 recite mapping of a user identification number (UIN) to a user name (UN) in a heterogeneous network (HN).

20

As stated in the last two versions of the Opening Appeal Brief: “Mapping UIN-UN in a HN” – see page 3, lines 4-14 and pag 16, lines 17-21 (“However, WINDOWS® OS computers and domains do not use UIDs and/or GIDs for

identification. Therefore, an exemplary user information management service maps user information (e.g., UIDs and/or GIDs) contained in the UNIX® OS network file system requests to WINDOWS® OS user information (e.g., user names).”);

5

Claims 39 (Group 4)

Concisely stated, independent claim 39 recites mapping a user name (UN) in for a user in a first network to a user name (UN') for the user in a second network to a user identification number (UIN) of the user using a map on a mapping server. As the first network and the second network differ, the mapping occurs in a heterogeneous network (HN).

As stated in the last two versions of the Opening Appeal Brief “Mapping UN-UN'-UIN in a HN using a Map on a Mapping Server” – see Group 1 for UN-UN'-UIN in HN and Figs. 4 and 5 for “Mapping Server” 428 and 528, respectively and see page 20, lines 4-11 (“Implementation of a single, central mapping server, e.g., common to an enterprise, can reduce administrative costs associated with mappings. Traditional setup of user name mapping per network file system server and/or network file system gateway normally requires effort to create and manage mappings, which are typically replicated on each server and/or gateway in a network. While not a requirement, implementation of user name mapping on a single, central server (or a limited

number of servers) presents significant advantages over traditional mapping practices.”);

Claim 41 (Group 5)

5 **Concisely stated**, independent claim 41 recites mapping an authenticated user (AU) to a user identification number (UIN) in a heterogeneous network (HN) using a map on a mapping server.

10 As stated in the last two versions of the Opening Appeal Brief: “Mapping AU-UIN in a HN using a Map on a Mapping Server – see Group 2 for “AU-UIN in a HN” and Figs. 4 and 5 for “Mapping Server” 428 and 528, respectively, and page 20, lines 4-11 (see Group 4 for text); and

Claim 43 (Group 6)

15 **Concisely stated**, independent claim 43 recites mapping a user identification number (UIN) to a user name (UN) in a heterogeneous network (HN) using a map on a mapping server.

20 As stated in the last two versions of the Opening Appeal Brief: “Mapping UIN-UN in a HN using a Map on a Mapping Server” – see Group 3 for UIN-UN in a HN and Figs. 4 and 5 for a “Mapping Server” 428 and 528, respectively, and page 20, lines 4-11 (see Group 4 for text).

As listed above, Groups 1-6 all recite a heterogenous network (HN) while Groups 3-6 further recite using a map on a mapping server.

6. Grounds of Rejection to be Reviewed on Appeal

5 Appellant respectfully requests that the Board review the grounds, as stated by the Examiner, for rejection of claims 1-4, 6, 11, 13-17, 19-24, 26-39 and 43 as being unpatentable over Blakely et al. (USPN 5,604,490) in view of Smith et al. (USPN 6,578,078) under §103; claims 7-10, 40-42 and 44 as being unpatentable over Blakely et al. and Smith et al. in view of White (USPN
10 6,826,692) under §103; and claims 5, 12, 18 and 25 as being unpatentable over Blakely et al. and Smith et al. in view of Gudjonsson et al. (USPN 6,564,261) under §103.

More specifically, Appellant respectfully requests review of two particular grounds of rejection. A first ground of rejection applies to all of the independent
15 claims (Groups 1-6) and a second ground of rejection applies to independent claims of Groups 4 and 6 (independent claims 39 and 43), which further recite “a map on a mapping server”.

First Ground of Rejection: Claims of Groups 1-6

20 In the Final Office Action, the Office stated: “It would have been obvious to one of the ordinary skill in the art at the time the invention was made to implement Smith’s teachings into the computer system of Blakely to manage

network communication in different operating systems.” (Final OA of Oct. 30, 2006 at page 3). Thus, all of the stated grounds of rejection are based on modifying the Blakely reference with the teachings of the Smith reference.

5 *Second Ground of Rejection: Claims of Groups 4 and 6*

Appellant notes that claims of Groups 4 and 6 recite “a map on a mapping server”. The Office relies on the foregoing first ground of rejection and then states at page 7 of the Final Office Action of October 30, 2006 that the Blakely reference discloses the recited “map on a mapping server”.

10

First Issue for Review: Groups 1-6

Per the first specific ground of rejection, the first issue in dispute is whether modification of the Blakely reference by the teachings of the Smith reference is supported by sufficient objective evidence of record to reject all of the independent claims. If not, then the grounds of rejection for all the independent claims are in error (Groups 1-6).

15

Second Issue for Review: Groups 4 and 6

Per the second specific ground of rejection, the second issue in dispute is whether all elements of independent claims of Groups 4 and 6 are taught or suggested by the Blakely reference and the Smith reference, as specifically stated in the Final Office Action of October 30, 2006 (i.e., that the Blakely

20

reference discloses “a map on a mapping server”). If not, then the grounds of rejection for independent claims 39 and 43 are in error (Groups 4 and 6).

7. Argument

5 As stated under the heading “Grounds of Rejection to be Reviewed on Appeal”, this Brief addresses a first specific ground of rejection and a second specific ground of rejection, which were stated in the Final OA of Oct. 30, 2006 at page 3 and at page 7, respectfully. Further, as emphasized above, the first specific ground of rejection applies to all the independent claims while the
10 second specific ground of rejection applies to the independent claims of Groups 4 and 6, which recite “a map on a mapping server”. Appellant structures this Argument section under two headings: “Argument for First Issue” and “Argument for Second Issue”.

15 HEADING: Argument for First Issue: Groups 1-6

With respect to the first issue on review, Appellant argues the following points:

Point 1. The objective evidence in the Blakely reference is insufficient to motivate one of ordinary skill in the art to make such a
20 modification because the Blakely reference teaches away from problems and solutions associated with multiple operation systems (MPEP §2145);

Point 2. The objective evidence of record indicates that the proposed modification would change the principle of operation of the system of the Blakely reference (MPEP §2143.01); and

Point 3. The objective evidence in the Blakely reference is
5 insufficient to support a reasonable expectation of success for the stated modification (MPEP §2143 and §2143.02).

Heterogeneous Network "HN"

All of the independent claims recite a heterogeneous network, which
10 includes a first network that uses a first operating system and a second network that uses a second operating system where the two operating systems differ.
The term "heterogeneous network" is at times abbreviated as "HN".

Standards

15 All claims are rejected under 35 U.S.C. §103(a). According to MPEP §2143:

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally
20 available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed
25 combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure.

With respect to Point 1, per MPEP §2143.01, “[t]he prior art must suggest the desirability of the claimed invention” and per MPEP §2145, “[i]t is improper to combine references where the references teach away from their combination”.

- 5 With respect to Point 2, per MPEP §2143.01, “[i]f the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims prima facie obvious”.

- 10 With respect to Point 3, per MPEP §2143.02, “[t]he prior art can be modified or combined to reject claims as prima facie obvious as long as there is a reasonable expectation of success”.

Specific Errors

- Independent Claims. According to the standards of MPEP §§2143 and
15 2145 (see Points 1, 2 and 3), Appellant submits that the Office erred in rejecting claims 1, 11, 13, 24, 26, 37, 39, 41 and 43 under 35 U.S.C. §103(a).

Dependent Claims. Appellant submits that the Office erred in rejecting all of the dependent claims under 35 U.S.C. §103(a) because these claims depend on the independent claims.

Rejection of Independent Claims: Groups 1-6

Independent claims 11, 24 and 37 are computer-readable medium (CRM) claims that recite subject matter of independent claims 1, 13 and 26, respectively. Thus, claims 1 and 11 belong to the same group, claims 13 and 24 belong to the same group and claims 26 and 37 belong to the same group.

The term “heterogeneous network” is abbreviated as “HN”, the term “user name” is abbreviated “UN”, the term “authenticated user” is abbreviated “AU” and the term “user identification number” is abbreviated “UIN”.

The independent claims are summarized as follows where a group includes associated dependent claims:

Claims 1 and 11 (Group 1) “Mapping UN-UN'-UIN in a HN”;

Claims 13 and 24 (Group 2) “Mapping AU-UIN in a HN”;

Claims 26 and 37 (Group 3) “Mapping UIN-UN in a HN”;

Claims 39 (Group 4) “Mapping UN-UN'-UIN in a HN using a Map on a Mapping Server”;

Claim 41 (Group 5) “Mapping AU-UIN in a HN using a Map on a Mapping Server”; and

Claim 43 (Group 6) “Mapping UIN-UN in a HN using a Map on a Mapping Server”.

As listed above, Groups 1-6 all recite a heterogenous network (HN) while Groups 3-6 further recite using a map on a mapping server. A representative claim is presented below for each group.

Group 1: Mapping UN-UN'-UIN in a HN

Claim 1 recites: *A method for mapping a user in a heterogeneous network comprising:*

5 *receiving on a computer in a first network a user name associated with a user in the first network wherein the first network uses a first operating system;*

mapping the user name to a user name associated with the same user in a second network wherein the second network uses a second operating
10 *system and wherein the first operating system and the second operating system differ; and*

mapping the user name associated with the user in the second network to a user identification number associated with the user in the second network.

15

Independent claims 1 and 11 include mapping a UN associated with a user in the first network to a UN' associated with the same user in a second network.

20 *Group 2: Mapping AU-UIN in a HN*

Claim 13 recites: *A method for mapping a user in a heterogeneous network comprising:*

receiving on a computer in a first network that uses a first operating system a user name and a password associated with a user in a second network that uses a second operating system wherein the first operating system and the second operating system differ;

5 *authenticating the user using the user name and the password to produce an authenticated user; and*

mapping the authenticated user to a user identification number associated with the user in the second network.

10 Independent claims 13 and 24 include (a) receiving a UN and password in a first network, (b) authenticating the user based on the UN and password and (c) mapping the AU to a UIN associated with the user in a second network.

Group 3: Mapping UIN-UN in a HN

15 Claim 26 recites: *A method for mapping a user in a heterogeneous network comprising:*

receiving on a computer in a second network a user identification number associated with a user in a first network; and

mapping the user identification number to a user name associated
20 *with the same user in the second network wherein the user's user identification number optionally maps to more than one user name for the user in the heterogeneous network;*

wherein the first network uses a first operating system and the second network uses a second operating system and wherein the first operating system and the second operating system differ.

5 Independent claims 26 and 37 include mapping a UIN associated with a user in a first network to a UN associated with the same user in a second network.

Group 4: Mapping UN-UN'-UIN in a HN using a Map on a Mapping Server

10 Claim 39 recites: *A method for mapping a user in a heterogeneous network comprising:*

receiving on a computer in a first network a user name associated with a user in the first network;

mapping the user name to a user name associated with the same user in
15 *a second network; and*

mapping the user name associated with the user in the second network to a user identification number associated with the user in the second network, wherein the mapping includes using a map on a mapping server and the mapping server maintains a default map, a simple map and/or explicit maps
20 *that provide override;*

wherein the first network uses a first operating system and the second network uses a second operating system and wherein the first operating system and the second operating system differ.

5 Independent claim 39 includes (a) mapping a UN associated with a user in the first network to a UN' associated with the same user in a second network and (b) mapping the UN' associated with the user in the second network to a UIN associated with the user in the second network using a map on a mapping server.

10

Group 5: Mapping AU-UIN in a HN using a Map on a Mapping Server

Claim 41 recites: *A method for mapping a user in a heterogeneous network comprising:*

receiving on a computer in a first network a user name and a
15 *password associated with a user in a second network;*
authenticating the user using the user name and the password to
produce an authenticated user; and
mapping the authenticated user to a user identification number
associated with the user in a second network wherein the mapping includes
20 *using a map on a mapping server and the mapping server maintains a default*
map, a simple map and/or explicit maps that provide override;

wherein the first network uses a first operating system and the second network uses a second operating system and wherein the first operating system and the second operating system differ.

5 Independent claim 41 includes (a) receiving a UN and password in a first network, (b) authenticating the user based on the UN and password and (c) mapping the AU to a UIN associated with the user in a second network using a map on a mapping server.

10 *Group 6: Mapping UIN-UN in a HN using a Map on a Mapping Server*

 Claim 43 recites: *A method for mapping a user in a heterogeneous network comprising:*

receiving on a computer in a second network a user identification number associated with a user in a first network; and

15 *mapping the user identification number to a user name associated with the same user in the second network wherein the mapping includes using a map on a mapping server and the mapping server maintains a default map, a simple map and/or explicit maps that provide override;*

wherein the first network uses a first operating system and the
20 *second network uses a second operating system and wherein the first operating system and the second operating system differ.*

Independent claim 43 includes mapping a UIN associated with a user in a first network to a UN associated with the same user in a second network using a map on a mapping server.

5 *Office's Stated Ground of Rejection*

In the Final Office Action, the Office stated: "It would have been obvious to one of the ordinary skill in the art at the time the invention was made to implement Smith's teachings into the computer system of Blakely to manage network communication in different operating systems." (Final OA of Oct. 30, 10 2007 at page 3). Thus, all of the Office's stated grounds of rejection are based on modifying the Blakely reference with the teachings of the Smith reference.

As argued below, the evidence of record does not support such a modification of the system of the Blakely reference. Appellant does not detail the Smith reference or other references as Appellant asserts that the system of 15 the Blakely reference cannot be logically or rationally modified per the Office's stated grounds of rejection.

Blakely Reference's Single OS and Single User Name

The Blakely reference aims to solve a security problem that exists for 20 multiple applications running on a single operating system, circa 1994. Specifically, where the applications have security measures but the operating system does not have an initial security measure (DOS, OS/2 and Macintosh

OS), a user needs to securely access the various applications individually. Col. 1, lines 8-27. The proposed solution is an OS that unifies the security protocols for each user. Col. 2, lines 31-37.

According to the proposed solution of the Blakely reference, each user
5 has only one user name (UN), which is “a character string that is unique . . . for the lifetime of the user’s account.” Col. 4, lines 24-26. When a user logs on to a server running the OS (e.g., via a TELNET connection) using his sole UN, the OS generates a user handle (UH) and associates it with the user’s UN. The UH is “a 32 byte value that is unique for the duration of a user’s logon session”.
10 Col. 4, lines 22-23. The OS then associates the “UH, UN pair” with the user’s credentials for the security measures of the various applications running on the OS. Col. 4, lines 33-58 (see “User A” of Figs. 3A and 3B). As explicitly stated: “All these systems [applications and the proposed mechanism for secure access to these applications] coexist under a single operating system”. Col. 4,
15 lines 19-20.

Point 1: Evidence Teaches Away / Does not Support Motivation

Per MPEP §2143.01, “[t]he prior art must suggest the desirability of the claimed invention”. Applicant submits that one of ordinary skill in the art would
20 not be motivated to modify the system of the Blakely reference by (i) introducing another, different OS and (ii) introducing another user name for the user.

The Blakely reference fails to mention anything other than a single operation system approach. Thus, in this regard, the Blakely reference teaches away from introduction of another, different OS. For at least this reason, Applicant submits that the Blakely reference teaches away from multiple user
5 names in a heterogeneous, multiple operating system environment. Per MPEP §2145, “[i]t is improper to combine references where the references teach away from their combination”.

Point 2: Proposed Modification Would Change Principle of Operation

10 Applicant also submits that modifying the Blakely reference to address multiple user names and multiple operating systems would change the principle of operation of the Blakely reference. Per MPEP §2143.01, “[i]f the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the
15 references are not sufficient to render the claims prima facie obvious”. More specifically, if an additional operating system was introduced into the system of the Blakely reference, the entire approach for handling application specific security issues would become irrelevant. In other words, the Blakely reference's system would need to operate according to a different principle.

20

Point 3: Evidence Insufficient to Support Reasonable Expectation of Success

Per MPEP §2143.02, “[t]he prior art can be modified or combined to reject claims as prima facie obvious as long as there is a reasonable expectation of success”. Applicant submits that the evidence does not support a reasonable expectation of success. Even if some motivation existed,

- 5 Applicant does not understand how one of ordinary skill in the art would modify the system of the Blakely reference. Would the additional, different OS be an OS like OS/2 or the Macintosh OS (circa 1994), i.e., having the same security related issue? How would the tables at steps 214 and 222 of Figs. 3A and 3B of the Blakely reference be modified, for example, to form Table 1 at page 20 of
- 10 the instant application, which includes a user name for a WINDOWS® OS and a user name for a UNIX® OS?

HEADING: Argument for Second Issue: Groups 4 and 6

- With respect to the second issue on review, Appellant argues that the
- 15 Blakely reference fails to disclose “a map on a mapping server”, as recited in the independent claims of Groups 4 and 6.

Heterogeneous Network “HN”

- Independent claims of Groups 4 and 6 recite a heterogeneous network,
- 20 which includes a first network that uses a first operating system and a second network that uses a second operating system where the two operating systems differ. The term “heterogeneous network” is at times abbreviated as “HN”.

Standards

All claims are rejected under 35 U.S.C. §103(a). According to MPEP §2143:

5 To establish a prima facie case of obviousness, three basic criteria
must be met. First, there must be some suggestion or motivation,
either in the references themselves or in the knowledge generally
10 available to one of ordinary skill in the art, to modify the reference
or to combine reference teachings. Second, there must be a
reasonable expectation of success. Finally, the prior art reference
(or references when combined) must teach or suggest all the claim
limitations. The teaching or suggestion to make the claimed
combination and the reasonable expectation of success must both
15 be found in the prior art, not in applicant's disclosure.

With respect to the second issue for review, Appellant notes that per
MPEP §2143.01, “the prior art reference (or references when combined) must
teach or suggest all the claim limitations”.

20 *Specific Errors*

Independent Claims 39 and 43. According to the standards of MPEP
§2143, Appellant submits that the Office erred in rejecting claims 39 and 43
under 35 U.S.C. §103(a).

Dependent Claims. Appellant submits that the Office erred in rejecting
25 the dependent claims of independent claims 39 and 43 under 35 U.S.C.
§103(a) because of their dependence.

Rejection of Independent Claims: Groups 4 and 6

Group 4: Mapping UN-UN'-UIN in a HN using a Map on a Mapping Server

Claim 39 recites: *A method for mapping a user in a heterogeneous*

5 *network comprising:*

receiving on a computer in a first network a user name associated with a user in the first network;

mapping the user name to a user name associated with the same user in a second network; and

10 *mapping the user name associated with the user in the second network to a user identification number associated with the user in the second network, wherein the mapping includes using a map on a mapping server and the mapping server maintains a default map, a simple map and/or explicit maps that provide override;*

15 *wherein the first network uses a first operating system and the second network uses a second operating system and wherein the first operating system and the second operating system differ.*

Independent claim 39 includes (a) mapping a UN associated with a user
20 in the first network to a UN' associated with the same user in a second network and (b) mapping the UN' associated with the user in the second network to a

UIN associated with the user in the second network using a map on a mapping server.

Group 6: Mapping UIN-UN in a HN using a Map on a Mapping Server

5 Claim 43 recites: *A method for mapping a user in a heterogeneous network comprising:*

receiving on a computer in a second network a user identification number associated with a user in a first network; and

mapping the user identification number to a user name associated
10 *with the same user in the second network wherein the mapping includes using a map on a mapping server and the mapping server maintains a default map, a simple map and/or explicit maps that provide override;*

wherein the first network uses a first operating system and the second network uses a second operating system and wherein the first operating
15 *system and the second operating system differ.*

Independent claim 43 includes mapping a UIN associated with a user in a first network to a UN associated with the same user in a second network using a map on a mapping server.

Office's Stated Ground of Rejection

Appellant finds the Final Office Action somewhat confusing as to what the Office contends the Blakely reference discloses. In the Final Office Action, to reject independent claims 39 and 43 (Groups 4 and 6), the Office stated:

5 "Blakley discloses . . . a map on a mapping server" and that "Blakley discloses . . . a map on a mapping server and the mapping server maintains a default map, a simple map and/or explicit maps that provide override" (Final OA of Oct. 30, 2006 at page 7). In support, the Office cited the Blakley reference at the abstract, figs. 1, 2, 3A, col. 1, lines 42-53, col. 3, line 14 to col. 4, line 57 and
10 col. 5, lines 1-28.

However, to reject independent claim 41 (Group 5), the Office stated: "Neither Blakley nor Smith specifically discloses wherein the mapping [of independent claim 41] includes using a map on a mapping server and the mapping maintains a default map, a simple map and/or explicit maps that
15 provide override" (Final OA of Oct. 30, 2006 at page 9).

Regardless of this apparent inconsistency, Appellant asserts that the rejection of independent claims 39 and 43 are in error because the Blakely reference does not disclose the recited "*map on a mapping server*". Appellant fails to find such a map in the Blakely reference at the abstract, figs. 1, 2, 3A,
20 col. 1, lines 42-53, col. 3, line 14 to col. 4, line 57 and col. 5, lines 1-28. Even if sufficient evidence to teach or suggest such a map could be found in the White

reference, the specific ground of rejection for independent claims 39 and 43 does not rely on the White reference.

Conclusion of Arguments

5 Appellant respectfully submits that the evidence of record and arguments based on this evidence show that the Office erred in rejecting the claims. In particular, specific grounds for rejection have been identified and discussed to show that the claims are not unpatentable over the Blakely reference, which the Office aims to modify to meet the claimed subject matter.

10 Appellant respectfully requests that the Board reverse the Examiner's rejection for the specific grounds of rejection identified herein. Should any issue remain that prevents furtherance of this Appeal, the Board or Office is encouraged to contact the undersigned attorney to discuss the unresolved issue.

15 Respectfully Submitted,
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8. Appendix of Appealed Claims (1-44)

Detailed Listing of All Claims 1-44:

- 1 (previously presented). A method for mapping a user in a
5 heterogeneous network comprising:
receiving on a computer in a first network a user name associated with a
user in the first network wherein the first network uses a first operating system;
mapping the user name to a user name associated with the same user in
a second network wherein the second network uses a second operating system
10 and wherein the first operating system and the second operating system differ;
and
mapping the user name associated with the user in the second network
to a user identification number associated with the user in the second network.
- 15 2 (original). The method of claim 1 further comprising accessing
resources on a computer in the second network using the user identification
number.
- 20 3 (original). The method of claim 1 further comprising authenticating the
user after the mappings.
- 4 (original). The method of claim 1 wherein the first network uses a
personal computer based operating system.

5 (original). The method of claim 1 wherein the second network uses a UNIX based operating system.

5 6 (original). The method of claim 1 wherein the computer comprises a gateway.

7 (original). The method of claim 1 wherein the computer comprises a client.

10

8 (previously presented). The method of claim 1 wherein the mappings include using a map on a mapping server.

9 (previously presented). The method of claim 1 wherein the mappings
15 include using remote procedure calls.

10 (original). The method of claim 9 wherein the remote procedure calls comprise at least one remote procedure call selected from the group consisting of getting credentials, authenticating using credentials, checking map status,
20 and dumping maps remote procedure calls.

11 (previously presented). A computer-readable medium storing computer-executable instructions to map a user name associated with a user in

a first network that uses a first operating system to a user name associated with a user in a second network that uses a second operating system, wherein the first operating system and the second operating system differ, and to map the user name associated with the user in the second network to a user

5 identification number associated with the user in the second network.

12 (original). The computer-readable medium of claim 11 further comprising a graphical user interface.

10 13 (previously presented). A method for mapping a user in a heterogeneous network comprising:

receiving on a computer in a first network that uses a first operating system a user name and a password associated with a user in a second network that uses a second operating system wherein the first operating system
15 and the second operating system differ;

authenticating the user using the user name and the password to produce an authenticated user; and

mapping the authenticated user to a user identification number associated with the user in the second network.

20

14 (original). The method of claim 13 further comprising accessing resources on a computer in the second network using the user identification number.

15 (original). The method of claim 13 wherein a computer in the first network performs the authenticating.

5 16 (original). The method of claim 13 wherein a computer in the first network performs the mapping.

17 (original). The method of claim 13 wherein the first network uses a personal computer based operating system.

10

18 (original). The method of claim 13 wherein the second network uses a UNIX based operating system.

19 (original). The method of claim 13 wherein the computer comprises a
15 gateway.

20 (original). The method of claim 13 wherein the computer comprises a client.

20 21 (original). The method of claim 13 wherein the mapping includes using a map on a mapping server.

22 (original). The method of claim 13 wherein the mapping includes using remote procedure calls.

23 (original). The method of claim 22 wherein the remote procedure calls
5 comprise at least one remote procedure call selected from the group consisting of getting credentials, authenticating using credentials, checking map status, and dumping maps remote procedure calls.

24 (previously presented). A computer-readable medium storing
10 computer-executable instructions to receive on a computer in a first network a user name and a password associated with a user in a second network, to authenticate the user using the user name and the password to produce an authenticated user and to map the authenticated user to a user identification number associated with the user in a second network wherein the first network
15 uses a first operating system and the second network uses a second operating system and wherein the first operating system and the second operating system differ.

25 (original). The computer-readable medium of claim 24 further
20 comprising a graphical user interface.

26 (previously presented). A method for mapping a user in a heterogeneous network comprising:

receiving on a computer in a second network a user identification
number associated with a user in a first network; and

mapping the user identification number to a user name associated with
the same user in the second network wherein the user's user identification

5 number optionally maps to more than one user name for the user in the
heterogeneous network;

wherein the first network uses a first operating system and the second
network uses a second operating system and wherein the first operating system
and the second operating system differ.

10

27 (original). The method of claim 26 further comprising accessing
resources on a computer in the second network using the user name.

28 (original). The method of claim 26 wherein a computer in the second
15 network performs the authenticating.

29 (original). The method of claim 26 wherein a computer in the second
network performs the mapping.

20 30 (original). The method of claim 26 wherein the second network uses
a personal computer based operating system.

31 (original). The method of claim 26 wherein the first network uses a
UNIX based operating system.

32 (original). The method of claim 26 wherein the computer comprises a
5 gateway.

33 (original). The method of claim 26 wherein the computer comprises a
server.

10 34 (original). The method of claim 26 wherein the mapping includes
using a map on a mapping server.

35 (original). The method of claim 26 wherein the mapping includes
using remote procedure calls.

15 36 (original). The method of claim 35 wherein the remote procedure calls
comprise at least one remote procedure call selected from the group consisting
of getting credentials, authenticating using credentials, checking map status,
and dumping maps remote procedure calls.

20 37 (previously presented). A computer-readable medium storing
computer-executable instructions to receive on a computer in a second network
a user identification number associated with a user in a first network and to map

the user identification number to a user name associated with the same user in the second network wherein the user's user identification number optionally maps to more than one user name for the user in the heterogeneous network, wherein the first network uses a first operating system and the second network
5 uses a second operating system and wherein the first operating system and the second operating system differ.

38 (original). The computer-readable medium of claim 37 further comprising a graphical user interface.
10

39 (previously presented). A method for mapping a user in a heterogeneous network comprising:
receiving on a computer in a first network a user name associated with a user in the first network;
15 mapping the user name to a user name associated with the same user in a second network; and
mapping the user name associated with the user in the second network to a user identification number associated with the user in the second network, wherein the mapping includes using a map on a mapping server and the
20 mapping server maintains a default map, a simple map and/or explicit maps that provide override; wherein the first network uses a first operating system and the second network uses a second operating system and wherein the first operating system and the second operating system differ.

40 (previously presented). The method of claim 39 wherein the mapping server further comprises algorithms for unmapping users, mapping multiple users and/or group mapping.

5

41 (previously presented). A method for mapping a user in a heterogeneous network comprising:

receiving on a computer in a first network a user name and a password associated with a user in a second network;

10 authenticating the user using the user name and the password to produce an authenticated user; and

mapping the authenticated user to a user identification number associated with the user in a second network wherein the mapping includes using a map on a mapping server and the mapping server maintains a default
15 map, a simple map and/or explicit maps that provide override;

wherein the first network uses a first operating system and the second network uses a second operating system and wherein the first operating system and the second operating system differ.

20 42 (original). The method of claim 41 wherein the mapping server further comprises algorithms for unmapping users, mapping multiple users and/or group mapping.

43 (previously presented). A method for mapping a user in a heterogeneous network comprising:

receiving on a computer in a second network a user identification number associated with a user in a first network; and

5 mapping the user identification number to a user name associated with the same user in the second network wherein the mapping includes using a map on a mapping server and the mapping server maintains a default map, a simple map and/or explicit maps that provide override;

10 wherein the first network uses a first operating system and the second network uses a second operating system and wherein the first operating system and the second operating system differ.

44 (original). The method of claim 43 wherein the mapping server further comprises algorithms for unmapping users, mapping multiple users and/or
15 group mapping.

9. Appendix of Evidence

None.

10. Appendix of Related Appeals and Interference

None.